

**UNITED STATES BANKRUPTCY COURT
EASTERN DISTRICT OF VIRGINIA
Richmond Division**

In re:

LeClairRyan, PLLC,¹

Debtor

Case No. 19-34574-KRH

Chapter 7

**TRUSTEE’S RESPONSE TO THE
APPLICATION FOR ADMINISTRATIVE EXPENSES
(Lori D. Thompson)**

Lynn L. Tavenner, Trustee, and not individually but solely in her capacity as the Chapter 7 trustee (in such capacity, the “**Chapter 7 Trustee**” and/or the “**Trustee**”) of the bankruptcy estate (the “**Estate**”) of LeClairRyan PLLC (“**LeClairRyan**” or the “**Debtor**”), in the above-referenced Chapter 7 case (the “**Case**”), by and through counsel, hereby files this Response (“**Response**”) to the relief requested in the Application for Administrative Expenses (the “**Administrative Claim Request**”) filed by Lori D. Thompson of Spilman, Thomas Battle PLLC on behalf of Lori D. Thompson. (the “**Claimant**”),² ECF No. 1360, In support of the Response, the Trustee respectfully represents:

Response

1. On April 27, 2022, this Court entered its Order Setting Bar Date For Filing Chapter

¹ The principal address of the Debtor as of the petition date was 4405 Cox Road, Glen Allen, Virginia 23060, and the last four digits of the Debtor’s federal tax identification number are 2451.

² Capitalized terms not otherwise defined herein shall have the meaning as prescribed in the Chapter 11 Administrative Bar Date Order.

Paula S. Beran, Esquire (Va. Bar No. 34679)
Tavenner & Beran, PLC
20 North Eighth Street, Second Floor
Richmond, Virginia 23219
Telephone: (804) 783-8300
Telecopy: (804) 783-0178

Counsel for Lynn L. Tavenner, Chapter 7 Trustee

11 Administrative Claims (“**Chapter 11 Administrative Bar Date Order**”), in which it set May 31, 2022 as the deadline to file a request for payment of any administrative expenses incurred on or after September 3, 2019 and before October 4, 2019, other than for amounts allowed previously by order of this Court or fees arising under 28 U.S.C. § 1930(a)(6).

2. The Claimant timely filed her Administrative Claim Request, as did other Persons (as defined in 11 U.S.C. § 101(41)).

3. The Chapter 11 Administrative Bar Date Order also contemplates a reconciliation process between the Trustee and the claimant. *See* paragraphs 6 and 7.

4. Pursuant to paragraphs 7 of the Chapter 11 Administrative Bar Date Order, the Trustee has resolved several requests made pursuant to the Chapter 11 Administrative Bar Date Order. Unfortunately, the Trustee has not yet engaged with the Claimant but desires to do so in the near future.

5. Consistent with paragraphs 6 and 7 of the Chapter 11 Administrative Bar Date Order, the Trustee respectfully request that the Administrative Claim Request be continued until the July omnibus hearing to allow additional time for dialogue between the Trustee and the Claimant

WHEREFORE, for the reasons stated herein, the Trustee respectfully requests that the Court not rule on the Administrative Claim Request and instead continue the matter until the July omnibus hearing.

Respectfully submitted,

LYNN L. TAVENNER, CHAPTER 7 TRUSTEE

Dated: June 21, 2022
Richmond, Virginia

By: /s/ Paula S. Beran
Paula S. Beran, Esquire (VSB No. 34679)
PBeran@TB-LawFirm.com
Tavener & Beran, PLC

20 North 8th Street
Richmond, Virginia 23219
Telephone: (804) 783-8300
Telecopier: (804) 783-0178

Counsel for Lynn L. Tavenner, Chapter 7 Trustee

CERTIFICATE OF SERVICE

I hereby certify that on this 21st day of June 2022, a true and correct copy of the foregoing Response has been served via electronic delivery and/or first-class mail, postage prepaid, to:

Shannon F. Pecoraro, Esquire
Office of the United States Trustee
701 East Broad Street, Suite 4304
Richmond, Virginia 23219
Trial Attorney

Lori D. Thompson, Esquire
Spilman, Thomas & Battle, PLLC
310 First Street, Suite 1100
P.O. Box 90
Roanoke, VA 24002-0090
Claimant

/s/ Paula S. Beran
Counsel